

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JONATHAN ARROYO MUNIZ

XXX-XX-4007

Debtor(s)

CASE NO 19-00247

CHAPTER 11

**APPLICATION FOR APPOINTMENT OF
ATTORNEY FOR DEBTOR**

TO THE HONORABLE COURT:

Comes now, Debtor, through the undersigned attorney, applicant in this matter, who apply to the Court for the approval of MIRIAM LOZADA RAMIREZ, ESQ., as debtor's attorney and respectfully states as follows:

1. Debtor Jonathan Arroyo Muniz filed on January 22, 2019 his petition for relief under Chapter 11 of the Bankruptcy Code and will continue operating business /and or work as a Debtor in Possession.
2. Debtor Jonathan Arroyo Muniz seeks to employ MIRIAM LOZADA RAMIREZ, ESQ, as attorney.
3. Debtor Jonathan Arroyo Muniz has chosen the attorney for the reason that she is well qualified to perform the work required in this case.
4. Debtor Jonathan Arroyo Muniz will rely on MIRIAM LOZADA RAMIREZ, for general counseling services in connection with this bankruptcy petition, including but not limited to the tasks as per engagement letter.
 - a. Represent on all proceedings before the U.S. Bankruptcy Court related to this bankruptcy petition as may be necessary as requested given a particular matter.
 - b. Represent in any negotiations leading to a settlement of the claims pending in this case.
 - c. Review and submit for your approval, reports and other financial memoranda to be filed with the U.S. Bankruptcy Court for the District of Puerto Rico, and the listed creditors to this bankruptcy petition.

5. The terms of the employment of and agreed to by the debtor, subject to the approval of the court is specified in the engagement letter and will be \$225.00 per hour of service. A retainer has been paid prior to the filing of the instant petition, in the amount of \$5,140.00 which has not been fully been consumed before assuming legal representation of the bankruptcy petition.
6. To the best of applicants knowledge, the professional whose employment is sought has no connection with the debtor, the creditors, any party in interest, its attorneys, its accounts and the U.S. trustee's Office or any person employed by said office.
7. That the attorney is a disinterested person and her employment is in the best interest of the estate.
8. That the attorney will not share or agree to share with any other person any amounts received as a retainer of to be received as compensation.
9. Sources of fund: for the purposes of subsection (a) (5) and (b) (2) of LBR 2014-1, the source of compensation will be generated upon information and believe from the debtor's business operation.
10. The debtor submits the CERTIFICATE OF PROPOSED ATTORNEY Miriam LOZADA Ramirez, Esq., attached hereto as EXHIBIT B, which states that applicant is a disinterred party within the meaning of 11USC section 101(14).
11. The attorney fully understands that the fees must be approved by the Court, and the US Trustee upon a proper application in accordance with the Bankruptcy Code and has agreed to consult with the debtor at all times in connection with the work performed.

NOTICE TO CREDITORS:

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be redeemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise

WHEREFORE, for the above stated debtor request that the present application to employ MIRIAM LOZADA RAMIREZ, ESQ as debtor's attorney be approved and in so authorize Counsel to assist in connection with this case at the rates set forth in the attached engagement letter, subject to further review and Order of this Court.

Date: February 11, 2019.

/S/ JONATHAN ARROYO MUNIZ
AVE ESTACION 438
ISABELA, PR 00662

ATTORNEY'S PHYSICAL AND POSTAL ADDRESS:

/S/MIRIAM S. LOZADA RAMÍREZ
ATTORNEY FOR DEBTOR
740 AVE HOSTOS
COND MEDICAL CENTER PLAZA
SUITE 211
Mayagüez, Puerto Rico 00682
TEL 787-834-3004
FAX 787 986-7346
miriamlozada@gmail.com

POSTAL ADDRESS:
PASEO LOS ROBLES
3020 JOSE MONGE
MAYAGUEZ, PR 000682

CERTIFICATE OF SERVICE

I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using ECF systems which sent a notification of such filing to all those who have registered for receipt of notice by electronic mail. I further certify that I have served to the US Trustee, ustpreion21.hr.ecf@usdoj.gov and by depositing true and exact copies thereof in the United States mail; postage prepaid to the non CM/ECF participants. As per master address list to all parties in interest to their address of record.

In Mayaguez, Puerto Rico, FEBRUARY 19,2019.

/S/MIRIAM S. LOZADA RAMIREZ, ESQ.

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IN RE:	CASE NO 19-00247
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CERTIFICATE OF PROPOSED LEGAL COUNSEL

I, MIRIAM LOZADA RAMIREZ ESQ., do hereby certify under penalty of perjury that to the best of my knowledge, information and belief the following is true and correct:

1. I am an attorney, admitted to practice as such before the Commonwealth of Puerto Rico Courts, the Federal District Court for the District of Puerto Rico.

2. I maintain an office for the practice of law located at, 740 AVE HOSTOS , COND MEDICAL CENTER PLAZA, SUITE 211, MAYAGUEZ, PR 00682-2375; TEL (787) 834 3004; FAX (787)986-7346; email:miriamlozada@gmail.com.

3. I have agreed to perform as legal counsel regarding the captioned case, as more detailed set forth in the foregoing APPLICATION FOR APPOINTMENT OF COUNSEL, which is subject to the approval of this Honorable Court.

4. That I am disinterested person pursuant to 11 U.S.C. § 101 (14).

5. In accordance with subsection (a) (1) and (b) of LBR 2014-1, neither I nor any member of my Firm holds or represents any interest adverse to the estate of the above-named debtors.

6. In accordance with subsection (a) (1) and (b) of LBR 2014-1 , I have no prior connection with the debtor, creditors, and any other party in interest, their respective attorneys and accountants, the U.S. Trustee Office and the U.S. Trustee Office personnel.

7.. In accordance with subsection (a) (4) and (b) of LBR 2014-1, there are no agreements on my part for the sharing of any compensation or reimbursement received or to be received number 11 D.S.C. §§ 330 (a) and 503 (b) (2), or otherwise in connection with this case, nor will I share in any such compensation or reimbursement received by another person under such sections.

8 The terms of compensation agreed to are as follows: I have received a retainer in this case in the amount of \$5,140.00 which sum, upon information and belief, was generated by the debtor from business operations and/or work.

9. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto. I have reviewed the provisions of LBR 2016-1.

10..Source of Funds. For the purposes of subsection (a) (5) and (b) (2) of LBR 2014-1 the source of compensation will be generated by the debtor from operations of his business and /or work.

11. The debtors submit the CERTIFICATE OF PROPOSED ATTORNEY of MIRIAM LOZADA RAMIREZ, Esq., attached hereto as Exhibit B, which states that applicant is a disinterested party within the meaning of 11 U.S.C. § 101 (14).

12. The attorney fully understands that her fee must be approved by the Court and the US Trustees upon proper application in accordance with the Bankruptcy Code and has agreed to consult with debtor's at all times in connection with the work performed.

13. In accordance with subsection (a) (7) I have reviewed the provisions of LBR 2016-1.

Wherefore, debtors request that this Honorable Court to authorize MIRIAM LOZADA RAMIREZ, ESQ., to assist it in connection with this case set forth in the attached engagement letter subject to further review and Order of this Court.

RESPECTFULLY SUBMITTED,

In Mayaguez, Puerto Rico, February 10,2019.

**/Miriam S. Lozada Ramirez, Esq.
Attorney for debtor(s)
USDCPR 208403
Tel. (787) 834-3004
FAX (787)986-7346
miriamlozada@gmail.com**

**POSTAL ADDRESS:
PASEO LOS ROBLES
3020 JOSE MONGE
MAYAGUEZ, PR 00682**

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VERIFIED STATEMENT

I, MIRIAM LOZADA RAMIREZ ESQ., do hereby certify under penalty of perjury that to the best of my knowledge, information and belief the following is true and correct:

1. I am an attorney, admitted to practice as such before the Commonwealth of Puerto Rico Courts, the Federal District Court for the District of Puerto Rico.

2. I maintain an office for the practice of law located at, 740 AVE HOSTOS , COND MEDICAL CENTER PLAZA, SUITE 211, MAYAGUEZ, PR 00682-2375; TEL (787) 834 3004; FAX (787)986-7346; email:miriamlozada@gmail.com.

3. I have agreed to perform as legal counsel regarding the captioned case, as more detailed set forth in the foregoing APPLICATION FOR APPOINTMENT OF COUNSEL, which is subject to the approval of this Honorable Court.

4. That I am disinterested person pursuant to 11 U.S.C. § 101 (14).

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7.. In accordance with subsection (a) (4) and (b) of LBR 2014-1, there are no agreements on my part for the sharing of any compensation or reimbursement received or to be received number 11 D.S.C. §§ 330 (a) and 503 (b) (2), or otherwise in connection with this case, nor will I share in any such compensation or reimbursement received by another person under such sections.

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11. The debtors submit the CERTIFICATE OF PROPOSED ATTORNEY of MIRIAM LOZADA RAMIREZ, Esq., attached hereto as Exhibit B, which states that applicant is a disinterested party within the meaning of 11 U.S.C. § 101 (14).

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Wherefore, debtors request that this Honorable Court to authorize MIRIAM LOZADA RAMIREZ, ESQ., to assist it in connection with this case set forth in the attached engagement letter subject to further review and Order of this Court.

RESPECTFULLY SUBMITTED, In Mayaguez, Puerto Rico, May 9,2018.

/Miriam S. Lozada Ramirez, Esq.
Attorney for debtor(s)
USDCPR 208403
740 AVE HOSTOS
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787-834-3004
e-mail: miriamlozada@gmail.com

MIRIAM LOZADA RAMIREZ

EDUCATION

1969-1972 UPR,RUM

B.A Science, mayor in Biology, minor in Chemistry

1988-1992 CATHOLIC UNIVERSITY OF PONCE

Juris Doctor

Magna Cum Laude

Achievement Award Administrative Law

Member of Law Review

Member of Phi Alpha Delta.

Admitted to the state bar on February 2, 1993.

Admitted to federal bar on December 10, 1993.

Continued courses in Bankruptcy with NACBA and Local Federal Bar

Experience

1993 – to present

Private practice in inheritance law, family law, torts

Civil practice

1997 - to present

Practice in immigration(visas, deportations) and bankruptcy law,(chapter 7,13,11,12)

Interests

Volunteer at Centro Espibi (center for children with special needs specializing in Spinal Bifida),

Member of NACBA (National Ass. Bankruptcy Attorneys) since 2005

Member of ASOCIACION DE NOTARIOS DE PUERTO RICO

COLLEGIATE AT COLEGIO DE ABOGADOS DE PR

SEMINARS:

- **ABI SEMINAR IN SAN JUAN AT El San Juan Hotel for the 2014 Caribbean Insolvency Symposium February 6-8.**
- **22ND Nacba Convention 2014 NY Hilton Midtown APRIL 10-13.**
- **Strategies and Litigation Techniques in the Bankruptcy Court
October 24, 2014
4 CLE credit hours
Inter American University School of Law**
- **"2014 Virtual Fall Workshop: Taxes in Bankruptcy"
Fri, Nov 21, 2014 TO NOV 22 ,2014**
- **TRANSACCIONES GARANTIZADAS EN LA LEY DE TRANSACCIONES COMERCIALES. FRI, FEB 6, 2015.COME 2012-585, COLEGIO DE NOTARIOS**
- **SEGUNDA JORNADA DE RECECHO DE QUIEBRA; MAY 15,2015;CAPR**
- **EL NOTARIO ANTE LA CANCELACION DE GRAVAMENES; MAY 22,2015; TALLER JURIDICO EDUCATIVO**

JONATHAN ARROYO-MUÑIZ
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BANCO POPULAR
PO BOX 362708
SAN JUAN, PR 00936

CRIM
BANKRUPTCY DIVISION
PO BOX 195387
SAN JUAN, PR 00919

MIRIAM LOZADA RAMIREZ
MIRIAM LOZADA RAMIREZ
URB PASEO LOS ROBLES
3020 JOSE MONGE
MAYAGUEZ, PR 00682-2000

BANCO SANTANDER
ATTN. BANKRUPTCY DEPT.
P.O. BOX 362589
SAN JUAN, P. 00936-2589

DEPARTMENT OF TREASURY
BANKRUPTCY SECTION (424-B)
P.O. BOX 9024140
SAN JUAN, PR 00902-4140

AAA
P.O.BOX 7066
SAN JUAN, PR 00916

CALIDAD AUTO SALES
PO BOX 50
VEGA BAJA, PR 00694

DEPARTMENT OF LABOR

ACCEPTANCE NOW
5501 HEADQUARTERS DRIVE
PLANO, TX 75024

CASH MAX
877 AVE HOSTOS
SUITE 2
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P O BOX 41269
SAN JUAN, PR 00940

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BALTIMORE, MD 21202

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BANKRUTPCY DEPT
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PHILADELPHIA, PA 19101-7346

AUTO PAWN

CLARO
PO BOX 360998
SAN JUAN, PR 00936

ISUANNETTE ORTIZ

AUTORIDAD ACUEDUCTOS
PO BOX 70101
SAN JUAN, PR 00936

COOP A/C DE AGUADA
PO BOX 543
AGUADA, PR 00602

LA FAMILIA

AUTORIDAD DE ENERGIA
MARIA GORBEA BANKRUPTCY CLAIMS
PO BOX 363928
SAN JUAN, PR 936

COOP AGUADA
BOX 543
AGUADA, PR 00602

MCKENZIE CAPITAL LLC
3390 MARY STREET SUITE 216
MIAMI, FL 33133

AUTORIDAD DE ENERGIA ELECTRICA
ATTN MARIA GORBEA
GPO BOX 363928
SAN JUAN, PR 00936

COOP DE ISABELA
BOX 552
ISABELA, PR 00662

OFFICE OF US TRUSTEE
500 TANCA ST
SUITE 301
SAN JUAN, PR 00901-1922

OFFICE US TRUSTEE
PO BOX 530202
ATLANTA, GA 30353-0200

POPULAR AUTO
PO BOX 50045
SAN JUAN, PR 00902-6245

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928

RENT A CENTER
16005 CARR 2 SUITE 50
AGUADILLA, PR 00603

SAMS CLUB
P O BOX 960023
ATLANTA, GA 30353-0942

SECRETARIO DEPARTAMENTO DEL TRABAJO
P O BOX 71592
SAN JUAN, PR 00936

UNIVERSAL INS CO
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4751 WILSHIRE BLVD SUITE 100
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